

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS: 48

FRANCINE GANNON
Plaintiff

VS.

MARRIOTT INTERNATIONAL, INC.
Defendant

C.A. No. 05-10815-RWZ

JOINT STATEMENT

Now come the parties, and hereby submit the following joint statement pursuant to the Notice of Scheduling Conference issued by the Court. The parties agree to be bound by the following litigation schedule:

- I. All interrogatories, requests for production, depositions, and any other discovery requests permitted under the Federal Court Rules of Civil Procedure shall be completed no later than December 1, 2005. The plaintiff will make her Rule 26 expert disclosure on or before December 1, 2005. Defendant's expert disclosure will be made no later than January 31, 2006. Expert depositions to be completed by February 30, 2006.
- II. All dispositive motions must be filed with the Court no later than March 15, 2006.
- III. The parties have discussed the possibilities of alternative dispute resolution and other mechanisms to limit costs of litigation, and will continue to discuss these options as litigation proceeds. The parties have also discussed, and will continue to discuss, the potential costs associated with conducting the full course, or various alternative courses, of litigation in this case. Neither party consents to trial by magistrate at this time.

Respectfully Submitted,

Plaintiff,

By her attorneys,



Michael P. Robinson BBO#649575

THE LAW OFFICES OF


STEPHEN M. ROBINSON

155 South Main Street

Providence, RI 02903

Defendant,

By its attorneys,



James M. Campbell, Esq. #541882

Christopher A. Callanan, Esq. #630649

One Constitution Plaza

Boston, MA 02129

by MPR
(w/permission)